Spill 11-10-87

ORIGINAL
(Red)

HAZARDOUS WASTE SITE ASSESSMENT REPORT

FINAL REPORT

Baltimore Steel Drum
~~BUCK STEEL DRUM~~
910 S. KRESSON STREET, BALTIMORE, MD

MD-51

JRB NO: 2-817-03-513-36

PREPARED FOR: USEPA REGION III
MD DEPT OF HEALTH AND MENTAL HYGIENE

PREPARED BY: JRB ASSOCIATES
8400 WESTPARK DRIVE
MCLEAN, VIRGINIA 22102

DATE: FEBRUARY 15, 1982

AUTHORIZATION

This report was prepared under the auspices of the U.S. Environmental Protection Agency Technical Assistance Panels program. The Panels are authorized by Section 2003 of The Resource Conservation and Recovery Act of 1976 (RCRA), Public Law 94-580, requiring the U.S.E.P.A. to "provide teams of personnel, including federal, state and local employees or contractor . . . to provide states and local governments upon request with technical assistance on solid waste management, resource recovery and resource conservation." JRB Associates is the Panels contractor for EPA Region III. JRB Associates was directed to assist the Maryland Department of Health and Mental Hygiene in conducting its "Dumpsite Assessment" program. This report documents work conducted by JRB as part of this program.

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1.0 SUMMARY AND RECOMMENDATIONS

Summary

Bucks Steel Drum is located at 910 S. Kresson Street, Baltimore, Maryland (Lat. 39° 17' 01" N, Long. 76° 33' 35" W). Until recently (1980), 55 gallon drums were recycled on-site. EPA identified the site as posing a potential hazard due to improper storage of petroleum containing drums. A background data search on the site was conducted during the period 12/2/81 to 12/16/31. A site inspection was performed on 12/7/81.

The background search revealed that in 1980, Bucks Steel Drum was bought by Jacob Klein Cooperage, P. O. Box 2267, Lehigh Valley, PA, 18001, and the name changed to Baltimore Steel Drum.[1] Jacob Klein Cooperage was unable to operate the site economically, and abandoned the site in late 1980 or early 1981. The state was aware that a problem existed at the site and, in the summer of 1981, conducted an inspection of the site and took approximately 12 samples of soil, sludges, and liquids.[2] Samples have shown that the waste consists of petroleum and petroleum by-products; however, one soil sample indicated that 188 ppm of toluene was present.[3] The state has since issued a clean-up order to the owners of Buck Steel Drum for removal of all drums, waste, and contaminated soil.[4] As of February 16, 1982, the owners of the site had commenced clean-up operations. Empty drums have been removed under manifest to permitted landfills. Drums containing material were to be sampled. Plans call for re-packing the remaining drums, excavating contaminated soil, and removing all equipment. The clean-up operation is inspected by the state on a daily basis. Staff scientists from JRB Associates visited the site on 12/7/81, and took photos of site conditions (see Appendix A). Based on data collected and on-site observations, it was determined that:

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[1]Personal Communication with Mr. Paul Thompson. MD DHMH. 12/10/81.

[2]Ibid.

[3]Personal Communication with Mr. Paul Thompson. MD DHMH. 12/7/81.

[4]Personal Communication with Mr. Paul Thompson. MD DHMH 12/10/81.

- Approximately 200 to 250 55-gallon drums are stored on-site. Many of these drums are empty; however, it is estimated that 20% to 25% of the drums are full. Many drums have had their contents spilled on the ground, while several are upright and have had their lids removed, exposing their contents to the environment.
- On-site observations suggest that site operators did not follow proper waste management practices while handling waste. The incinerator showed no evidence that any air pollution control devices were used, and there was no afterburner on the incinerator. In addition, drums showed evidence of having been run over by a tracked vehicle, spilling the contents on the ground. These observations indicate that the site was not properly operated.
- It is probable that, in addition to petroleum wastes, other hazardous wastes were improperly handled on-site. The sample containing 188 ppm of toluene, plus drum labels listing contents as "isocyanates, chlorobenzenes, paint, solvents not otherwise specified, and monochloroacetone," indicate that other products besides oil and oil sludges were handled at the site. Given that mismanagement is suspected, it is reasonable to assume that, if these wastes were on-site, they were not managed properly.
- Using the Mitre Model, the site scores a 1.99 ground water subtotal and a .518 surface water subtotal. No air rating was possible as no verified airborne release of contaminants was found. Overall site score was 1.19. Site score was low due to: (1) no direct evidence of ground or surface water contamination, nor airborne release, and (2) the low number of drums on-site.

Recommendations

As a result of these efforts, the following recommendations are made:

- Action on site clean-up, as contained in the order issued by the Maryland Department of Health and Mental Hygiene, should be completed as soon as is possible. The measures advised by the state: drum repackaging and removal, draining and removal of liquids in sumps, removal of contaminated soil, and installation of site security measures, should be sufficient to remove the hazard posed by the site.
- The USEPA Region III office should be regularly informed of developments concerning this site. While state officials are capable of overseeing and/or conducting any on-site work which is required, the owner of the site is not a resident of the State of Maryland, and any legal action taken by the state may require the assistance of Federal officials.

- If on-site sampling should indicate that more hazardous materials such as PCB's or dioxin, or extremely flammable or volatile materials, remain on-site, immediate removal of drums remaining on-site may be necessary.
- After clean-up, the site should be secured by fixing the torn sections of fence, boarding or otherwise blocking windows, and installing a gate at the entrance. In addition, soil samples should be taken to insure completeness of the clean-up efforts.

2.0 BACKGROUND INFORMATION

Introduction

Buck Steel Drum, located at 910 S. Kresson Street in Baltimore, MD, was a drum recycling facility which ceased operations in 1980. The site had been sold by Harry and Herman Buck, address unknown, to Jacob Klein Cooperage, P. O. Box 2267, Lehigh Valley, PA, 18001, and the name changed to Baltimore Steel Drum.[1] Under apparent new ownership, the facility notified as a RCRA generator, transporter, and TSD facility (EPA ID # MD0073O556) in August, 1980.[2] The facility did not submit a Part A application as required, in November, 1980, and may already have gone out of operation by that time. Klein Cooperage hoped to operate the site as a recycler, but found that operations at the site were not economical, and the site was abandoned.[3]

Maryland officials knew of the Buck Steel Drum operations. Apparently, the operators owned several other sites throughout the area. In November, 1979, the Maryland Water Resources Administration issued an order to Buck's Steel Drum and Ryan's Moving and Hauling, 4807 Valley Forge Road, Randallstown, Maryland, 21133, to stop the dumping of 55-gallon drums of petroleum products at another site at 8234 Rosebank Avenue, and to remove all spilled material from the site.[4] Buck Steel Drum complied with the order.[5]

In the summer of 1981, knowing that operations at the 910 S. Kresson Street address had ceased, Maryland officials conducted a site inspection. Full safety gear was worn, and gas monitoring and detection equipment was carried.[6] No airborne contaminants were detected, despite a report of a

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[1] U.S. EPA Region III Notification Data Base.

[2] Personal Communication with Mr. Paul Stancil. MD DHMH. 12/7/81.

[3] Personal Communication with Mr. Paul Thompson. MD DHMH. 12/7/81.

[4] Ibid.

[5] Personal Communication with Mr. Paul Thompson. MD DHMH. 12/18/81.

[6] Personal Communication with Mr. Paul Stancil. MD DHMH. 12/7/81.

very strong odor while on-site.[1] Samples were taken, and results indicated that the majority of the waste consisted of oil and oil sludges. One soil sample, however, showed that 188 ppm of toluene was present.[2] The samples were analyzed by the MD DHMH laboratory for volatile and semi-volatile organics, pesticides, and priority pollutants.

In November, 1981, the state issued a clean-up order to Jacob Klein Cooperage requiring removal of all drums and contaminated soil, and installation of site security measures.[3] The site clean-up operations started in early February, 1982.

Demographics

The area immediately surrounding the Buck Steel Drum site at 910 S. Kresson Street consists of industrial plants including metal and scrap recyclers. Less than 300 people are thought to live within a ¼ mile radius of the site (see Map B-1); however, over 3000 people are estimated to live within ½ mile of the site, and over 10,000 within a 1 mile radius of the site. Within this 1 mile radius, there are several schools. They are:

- Ruhrah School - 1800 feet east of site
- Canton School - ½ mile west of site
- Unidentified school - ½ mile northwest of site.

The Baltimore City Hospital is located ½ mile northwest of the site. The Buck Steel Drum facility is located within ½ mile of the Baltimore Harbor Tunnel Thruway (1600 feet east) and ½ mile from the I-95 O'Donnell Street off-ramp. Eastern Avenue runs east-west, 1600 feet north of the site, and the Conrail/Amtrak northeast corridor rail line lies approximately 1 mile north of the site. The area contains numerous oil and gas and petroleum product storage tanks, a few within ¼ mile of the facility.

Geology[4]

The area surrounding Buck Steel Drum consists of clay and sand units of the Arundel Formation, and the sand unit of the Patapsco Formation

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[1] Personal Communication with Mr. Paul Stancil. MD DHMH. 12/17/81.

[2] Ibid.

[3] Personal Communication with Mr. Paul Thompson. MD DHMH. 12/7/81.

[4] Geologic Map of Baltimore County and City. Maryland Geologic Survey. 1976.

(see Map B-3). The site lies on the clay unit of the Arundel, which ranges in thickness from 1.6 to 100 feet. Underlying the clay unit is the sand unit of the Patuxent Formation, which is a major water bearing zone. The Arundel clay is composed of gray, brown, black, and red kaolinitic and illitic clay (resulting from the alteration of Feldspar under different weathering conditions), which are interbedded with quartz sand and silt as lenses. The Arundel clay is typically poorly bedded, but can be massive. Lignitized wood remains have been found in the Formation.

The sand facies of the Patuxent Formation underlying the Arundel clay consists of highly variable sand, gravel, silt, and clay with hematite-limonite cement. The sand and gravels are usually quartzose, and are well rounded, while a kaolinitic clay-quartz silt matrix is common. The formation ranges from 1.6 to 115 feet in thickness.

To the northeast and in a band stretching from southwest around to the east of the site, artificial fill has been extensively used. This fill consists of heterogeneous material such as slag, refuse, dredge spoil, and rubble. Filled areas include former quarry sites, diked flood plains, low lying areas adjacent to streams, and old shoreline.

Finally, to the northeast of the site lies an outcrop of the sand unit of the Patapsco Formation. This sand usually consists of well-sorted, medium to fine-grained sand with locally abundant quartz gravel. This outcrop is thought to be isolated, and underlain by Arundel Formation clay.

Approximately 150 to 200 feet of overburden separates the site from crystalline bedrock.[1]

Hydrology[2]

The water bearing sands of the Patuxent Formation are separated from the site by an unknown thickness of Arundel clay. The Patuxent is an important source of ground water in Harford, Baltimore, Anne Arundel, and Prince Georges Counties, and is the source of ground water for the towns

[1] Map of Baltimore City Showing Amount of Overburden Covering Underlying Rocks. Bureau of Plans and Surveys, Maryland Geological Survey. 1935.

[2] Ground Water Aquifers and Mineral Commodities of Maryland. Maryland Geological Survey. State of Maryland. 1969.

of Aberdeen, Bowie, Glen Burnie, and some suburban communities around Washington, DC. In the Baltimore area, the Patuxent is an important source of cooling water for several industries.

Depending upon the thickness of the Arundel clay separating the site from the Patuxent sand, downward migration of contaminants to the sand may or may not be possible. If the overlying clay unit is sufficiently thick to prevent downward movement and ground water contamination, contaminated runoff will move to Baltimore City storm sewers and, thus, into the Patapsco River. If the clay layer is thin, it may not be sufficient to prevent migration of contaminants to the Patuxent Aquifer.

The Baltimore area large scale (1:62500) geologic map indicates that the nearest outcrop of the Patuxent sand is approximately 1.3 miles to the northwest of the site.[1] According to the Maryland Geologic Survey, the Patuxent Formation dips gently to the southeast at less than 1%.[2] Assuming that the dip of the Patuxent is between 0.5% and 1% to the southeast, that the nearest outcrop is 6860 feet to the northwest, and that the elevations between the points are equivalent, it is estimated that between 34 feet to 68 feet of Arundel clay lies between the site and the Patuxent sand. It is considered unlikely that any contaminants are migrating through this clay, and that, most likely, contaminated runoff is entering the Baltimore storm sewer system and then flowing into the Patapsco River.

Net precipitation at the site is estimated at 10 inches per year. Average annual rainfall is estimated at 44 inches per year. The highest recorded 24 hour rainfall at Baltimore-Washington International Airport is greater than 3 inches.

Critical Environments

The site is not located near any critical environments. However, any runoff from the site would enter the Baltimore storm sewer system and subsequently enter the Patapsco River. The Patapsco River drains into the Chesapeake Bay, which is one of the most productive estuary systems in the world.

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[1] Geologic Map of Baltimore County and City. Maryland Geological Survey. 1976.

[2] Ground Water Aquifers and Mineral Commodities of Maryland. Maryland Geological Survey. State of Maryland. 1969.

Waste Characteristics

It is difficult to characterize what types of waste could be present at Buck Steel Drum. Samples have shown that petroleum and petroleum by-products are definitely present, along with toluene. Wastes from petroleum production and waste oil usually contain significant concentrations of toxic metals including lead and chromium. These metals, in addition to being toxic, have been shown to be potentially carcinogenic and bio-accumulative.[1] In addition, studies have shown these metals to be mobile, and thus could migrate off-site. If petroleum wastes including waste oils contained significant concentrations of metals, and had been incinerated without proper air pollution control equipment, the possibility exists that metal compounds including lead and hexavalent chromium were released to the environment.[2]

Toluene is a toxic chemical absorbed into the body through inhalation, ingestion, and through the skin. Toluene is reported to cause chromosomal changes. Acute toxic effects - central nervous system depression - occur at concentrations of 200 ppm. Toluene is relatively volatile and soluble and may migrate from a disposal site into the environment. It is reported to be persistent in abiotic environments.[3] When exposed to heat, toluene emits toxic fumes.[4]

Drums on-site were marked as containing "chlorobenzenes," "isocyanates," and "monochloroacetone." Chlorobenzene has a flash point of 85°F, and the oral LD_{50} (RAT) is 2910 mg/kg. Chlorobenzene is dangerous when exposed to heat or flame, and can explode. It reacts violently with $AgClO_4$ - dimethyl sulfoxide.[5] Isocyanates have violent reactions with alcohol. When heated to decomposition or when contacted by acids, isocyanates emit toxic fumes.[6] Chloroacetones are acute toxic wastes with LD_{50} (RAT) of 50 mg/kg. Chloroacetones also emit a poisonous gas and when heated to decomposition, emit phosgene gas. Old material can explode spontaneously.[7]

[1] U.S. EPA. Listing Background Document: Petroleum Industry. November, 1980.

[2] Ibid.

[3] Ibid.

[4] Dangerous Properties of Industrial Materials. Fifth Edition. N. Irving Sax. Van Nostrand Reinhold. New York. 1979.

[5] Ibid.

[6] Ibid.

[7] Ibid.

3.0 FIELD INSPECTION REPORT

(REFER TO PHOTO LOG, APPENDIX A, AND SITE SKETCH, MAP B-2)

A field inspection of the Buck Steel Drum site was conducted on 12/7/81. The team consisted of:

- Mr. Joe Stang - MD DHMH
- Mr. Ed Tokarski - Environmental Scientist - JRB Associates
- Mr. Philip Spooner - Soil Scientist - JRB Associates.

The Site Inspection Team arrived at the site at approximately 11:00 a.m. The skies were overcast, and the temperature was approximately 40°F. There was little wind. The team, carrying an ENMET CgS-100 gas meter, entered the site from the east, between two vandalized buildings. There is no gate at the entrance to the site. An abandoned truck with a 1980 Maryland registration tag, and "Bucks Steel Drum" lettering on the side, was parked to the left of the entrance. To the right of the entrance sits a drum which appeared to be full. The drum is marked "Flammable Liquid" and "Paint - Flash Point 73°F or Over" (Photo #1).

Walking west between the two buildings (#1 and #2), broken doors and windows can be noticed. The green, fiberglass siding has been ripped off Building #2, and drums can be seen when looking through the building (Photo #2). The buildings contain miscellaneous equipment, sumps full of oily liquid, and containers of various types. A container in Building #1 has leaked down the side, forming a hard, yellowish material (Photo #3).

Walking south from Building #1, the metal siding has been ripped from Building #2, rusted drums are stacked haphazardly, and a portion of the incinerator smokestack lies on top of the building (Photo #4). The smokestack consisted of 6 or 7 55-gallon drums, minus tops and bottoms, which were welded together. Many abandoned drums are stacked along the western fence (see Map B-2 and Photos #6, 13, 20). Approximately 20-25% of these drums are full. Many are rusted and a few are bulging.

Approximately 100 drums are stacked behind Building #2, along the northern fence (Photo #8, 9, 10). There is a hole in the fence along the alley between the fence and Building #1.

The incinerator shows evidence of uncontrolled operations. There are no doors or other devices to close off the combustion chambers from outside. The side of the incinerator is black and charred. There was no evidence of an afterburner or air pollution control devices. In Building #2 equipment is scattered, and several drums have been knocked over (Photo #15). Sumps in Building #2 are full of a black, oily material.

Along the outside of Building #2, south of the incinerator, are several drums which are open (Photos #16, 19, 20). These drums contain unidentified liquids which are green (Photo #18), black and viscous (Photo #17), and grey sludge with yellow and red supernatant on top (Photos #20, 21).

In the southwestern portion of the site, numerous drums have been spilled, crushed or punctured. Their contents have spilled on the ground forming a grey, sludge-like mass (Photos #20, 23, 24). This area shows evidence that a tracked vehicle has crushed several drums. An oily runoff is located along the southern boundary.

The drum storage area is not underlain by any cement or other barrier. The "soil" is black, oily and full of bricks, stones, and other rubble. In walking around the site, several labels on drums could be read. These included: isocyanates, chlorobenzenes, paints, solvents not otherwise specified and mono-chloroacetone. It is unknown if any of these wastes were or are present at the site.

During the site inspection, Mr. Stang stated that the state had taken samples, and had found only petroleum and petroleum by-products. One soil sample showed toluene present at 188 ppm concentration.

The team left the site at approximately 11:45 a.m.

4.0 CONCLUSIONS AND RECOMMENDATIONS

Conclusions

Based on background information collected, and evidence gathered from the on-site inspection, the following conclusions are made concerning the Buck Steel Drum site:

- Of the approximately 200 to 250 drums stored on-site, 20% to 25% contain unknown material. Many drums are open, crushed, punctured or have had their contents spilled on the ground. Sumps are full of oily material, and the incinerator shows evidence of improper operation; no air pollution devices were evident. This indicates that improper management of waste occurred on-site. This improper management probably included burning of waste without controlled temperatures or APC devices, spilling of drum contents into sumps or on the ground, and improper handling of drums.
- Evidence indicates that hazardous wastes other than oils, oil sludges and toluene have probably been mismanaged at the site. Material observed on-site was not consistent with what is expected of oil sludges. Labels from drums indicate that at one time, they contained other materials. It is not known if these materials were present when the drums were brought on-site.
- The most probable routes of contamination are air and surface water. Toluene is relatively volatile, and evidence from the incinerator indicates that it was operated improperly. Toluene is also soluble, and contaminated runoff can enter storm sewers and then the Patapsco River.
- Ground water is probably not in danger of contamination from the site. It is believed that at least 30 feet of Arundel clay lies between the site and the top of the Patuxent Sand.

Recommendations

Based on available information and the conclusions made above, the following recommendations are made:

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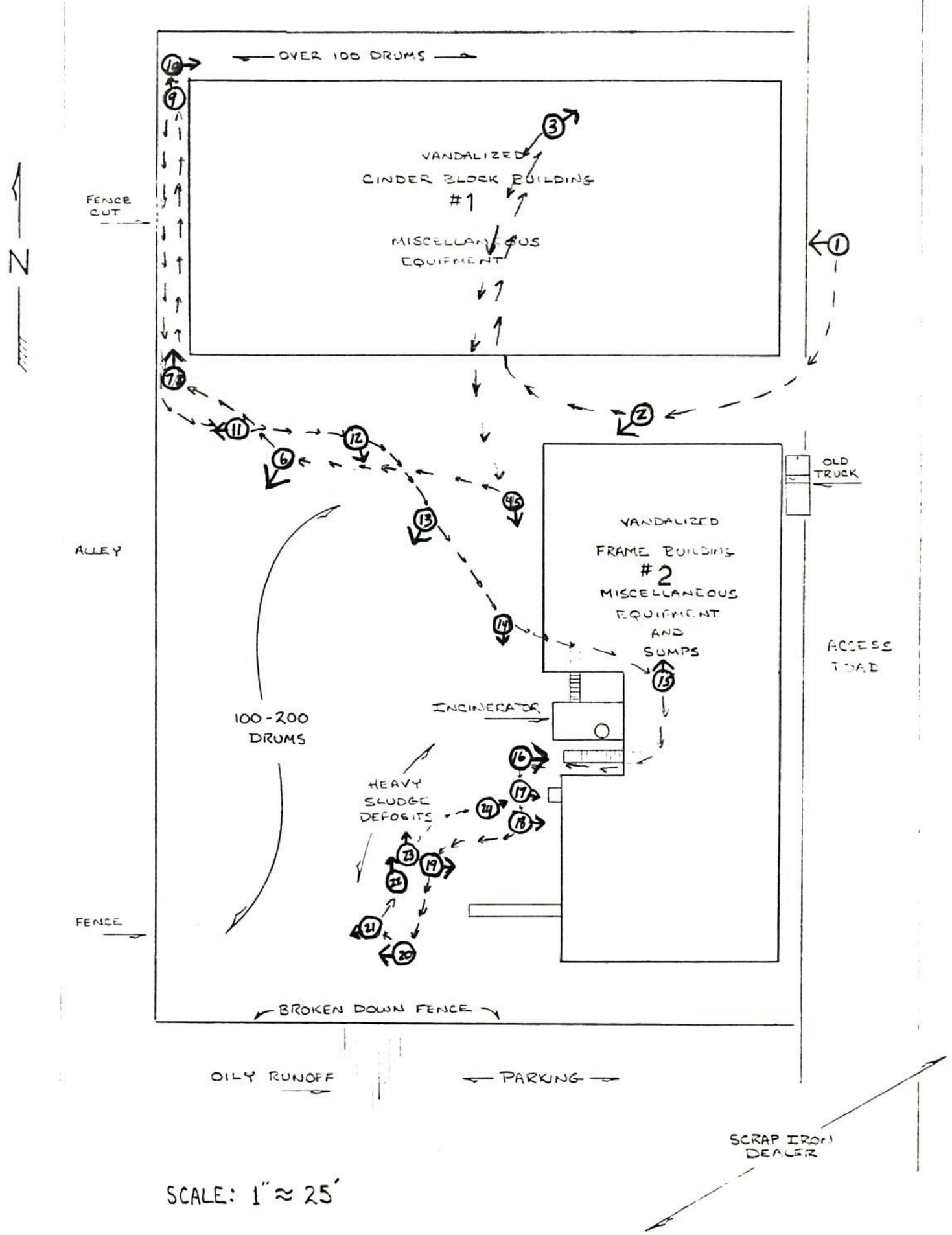
- Action on site clean-up, as contained in the order issued by the Maryland Department of Health and Mental Hygiene, should be completed as soon as is possible. The measures advised by the state: drum repackaging and removal, draining and removal of liquids in sumps, removal of contaminated soil, and installation of site security measures, should be sufficient to remove the hazard posed by the site.
- Results of samples taken during clean-up should be submitted to USEPA Region III and MD DHMH for review.
- The USEPA Region III office should be regularly informed of developments concerning the site. While state officials are capable of overseeing and/or conducting any on-site work which is required, the owner of the site is not located in the State of Maryland, and any legal action taken by the state may require the assistance of Federal officials.
- If on-site sampling should indicate that more hazardous materials such as PCB's or dioxin, or extremely flammable or volatile materials, remain on-site, immediate removal may be necessary.
- The site should be secured by fixing the fence surrounding the site, blocking the windows, and installing an access gate. Samples should be taken after clean-up to determine completeness of the clean-up efforts.

APPENDIX A: PHOTO LOG

BUCKS STEEL DRUM
MD 51
12/07/81
PHOTO LOG

ORIGINAL
(Red)



ORIGINAL (Red)

PHOTO LOG

Site: Bucks Steel Drum - MD-51
Date: 12/7/81
Photographer: Ed Tokarski
Film: 35mm, 100ASA Print Kodak
Conditions: Overcast, temperature 40°F. Time approx. 1100-1150

1. Facing west. Abandoned Drum, grey-rusted. Drum full - label "flammable liquid, paint flash point 75° or over."

2. Facing southwest through building. Drums visable through building. Sides of building have been torn off. Drum in building - foreground - lies in sump full of black, oily material.

3. Facing northeast in Building #1 along north wall. Containers stacked on top of one another. Top container punctured. Contents has formed "yellow icicle" down side of can. Material hard. (Time exposed 1 sec.)

4 - 5. Facing south. Building #2 on left. Drums on right, incinerator on left with part of "stack" on roof. "Stack" consists of 6-7 55-gallon drums welded together. Drum at top of stack has been "eaten" away.

6. Facing southwest. Drums stacked along west fence. Neighboring building in background. Drums empty/full and rusted.

7 - 8. Facing north between west fence and Building #1. Note hole in fence. Drums fallen from stack behind Building #1.

9. Facing north. Close up of drums shown in #7 - 8.

10. Facing east behind Building #1. "X" in right foreground is approx. 5 1/2 feet high. Drums stacked behind building. Tan structure in back is off-site storage tank.

11. Facing west. Abandoned drum - full. Contents unknown. Note drum in foreground which has been tipped. Black, oily solid material has spilled from drum.

12. Facing southeast. Drum which has been tipped, spilling contents onto ground. Contents black-gray and solid.

13. Facing southwest towards far corner of site. Drums stacked along west fence. Some of these drums are full.

ORIGINAL (Red)

14. Facing south. Building #2 on left. Note incinerator on left (white structure). Note black, charred appearance. Material in foreground has been spilled from drums. Note fence in background has been broken.

15. Facing north inside Building #2. Drums, buckets, containers scattered around. Drum opener silhouetted against doorway.

16. Facing east. Rollers on left entering Building #2. Drums stacked against Building. Drum in center labeled "AMINO-BENZANILINE."

17. Facing east. Close up of contents of open drum along Building #2. Material very viscous, color black. Liquid on top has oily sheen.

18. Facing east. Close up of bucket containing green liquid. Bucket along side of Building #1. Note reaction ring around bucket - liquid boundary.

19. Facing east. Drums stacked along outside wall of Building #2. Note yellow spill from drum in center. Liquid lies in puddles on ground.

20. Facing west towards southwest corner of site. Drums in this area have been tipped, crushed, punctured. Contents have spilled onto ground. Note drums in foreground which are open.

21. Facing west. Close up of drum shown in #20. Material is sludge with yellowish liquid on top. Drum in foreground has rust-colored liquid with oily sheen on top.

22. Facing north. Close up of drums which have been crushed by tracked vehicle. Contents have spilled. Contents grey-black. Looks like "pillow lava." Spilled material is hard.

23. Facing north. Close up of spilled material described in #22. Drum to left, - background is full and rusted. Drum to center which is on side contains hardened mass like that spilled on ground.

24. Facing east. Close up of spilled material. Material tan to black, Very hard. Soil in foreground covered with oil.

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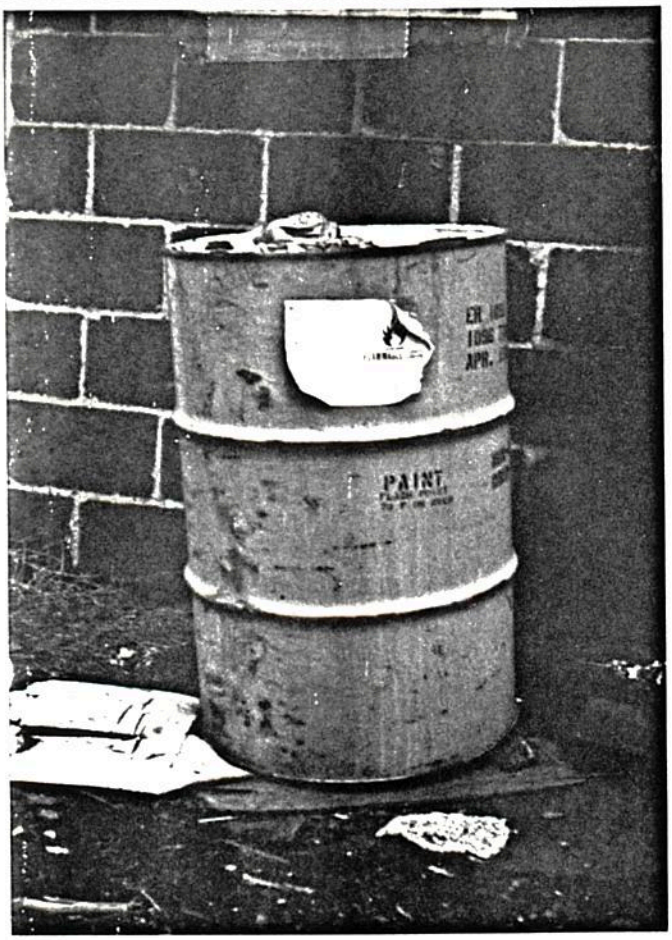
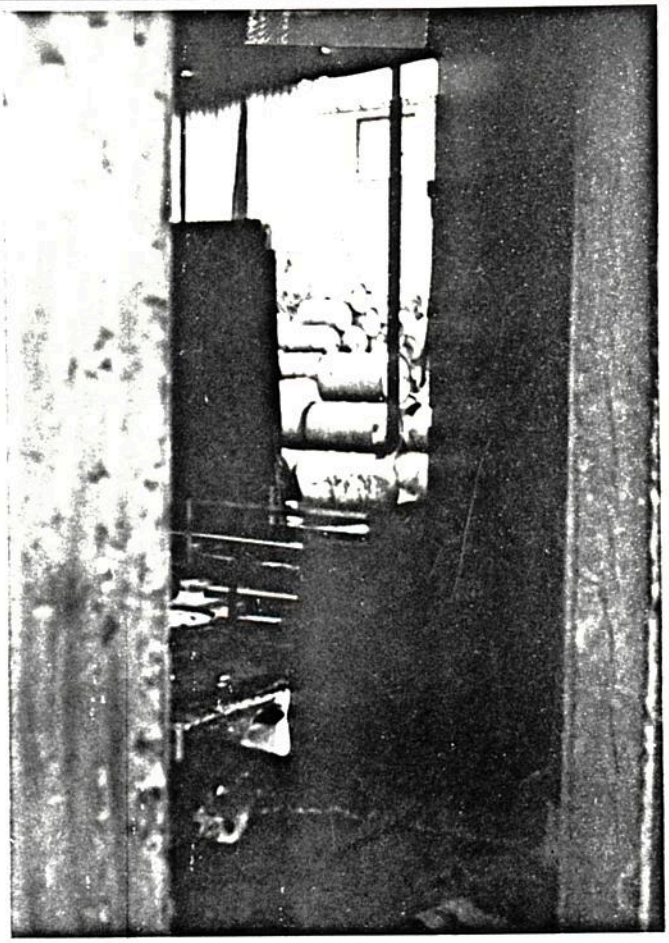
(Red)





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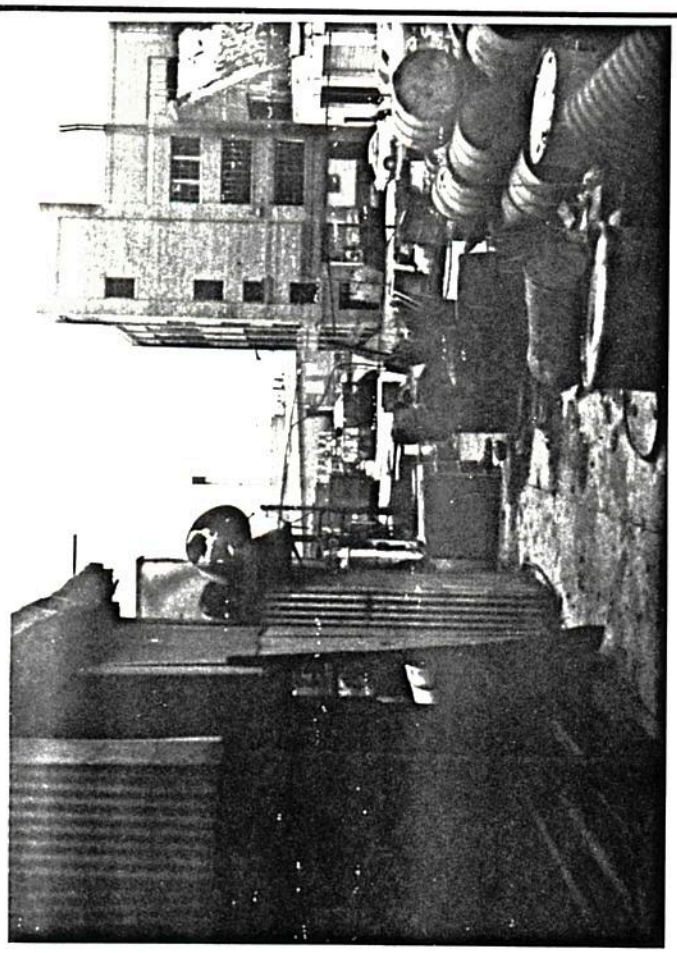
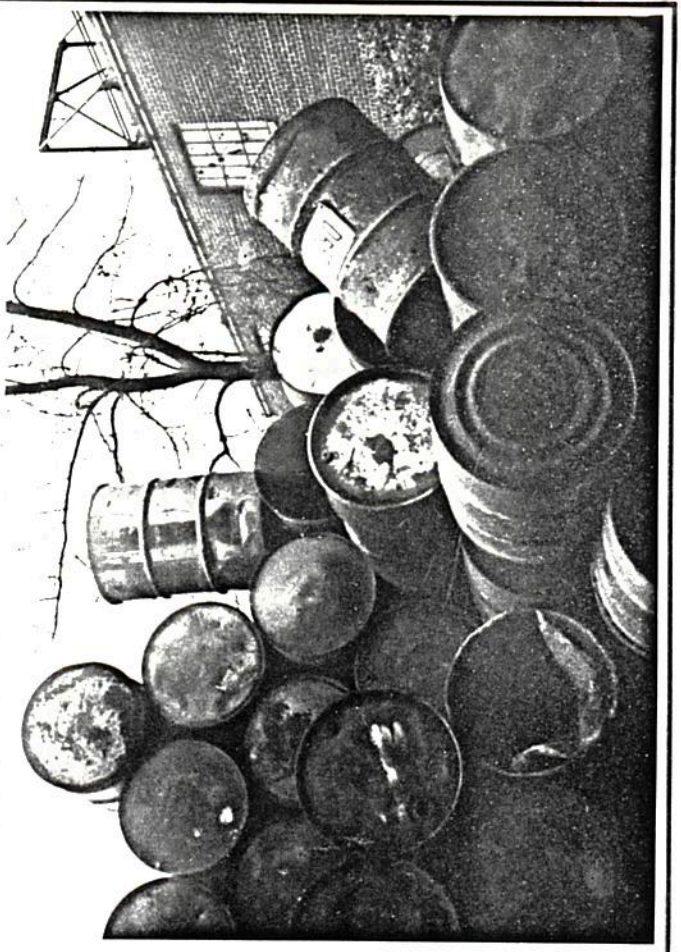
BUCKS STEEL DRUM
MD 51
12/07/81





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BUCKS STEEL DRUM
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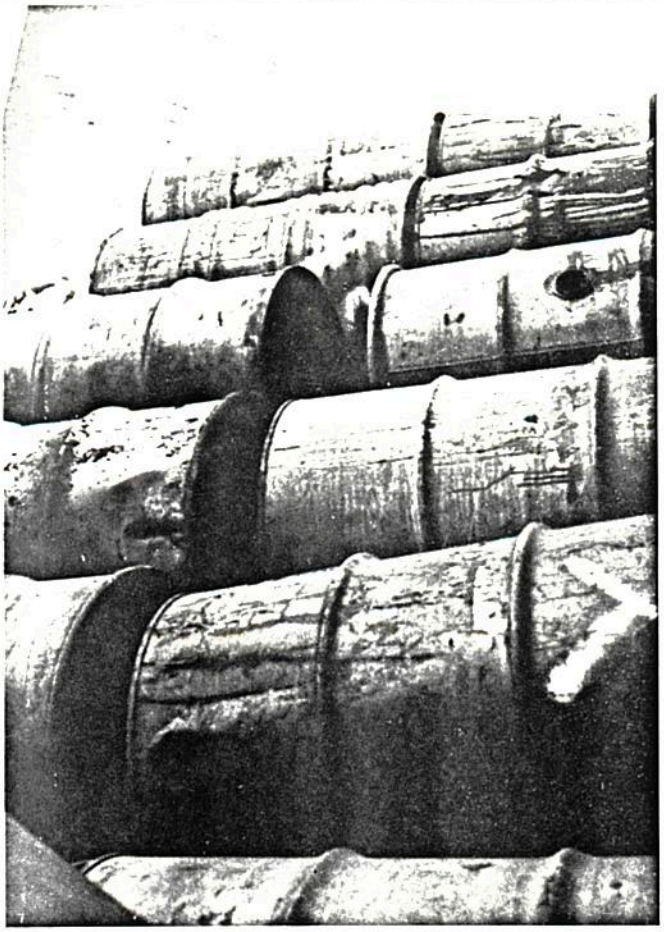
12/07/81



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BUCKS STEEL DRUM
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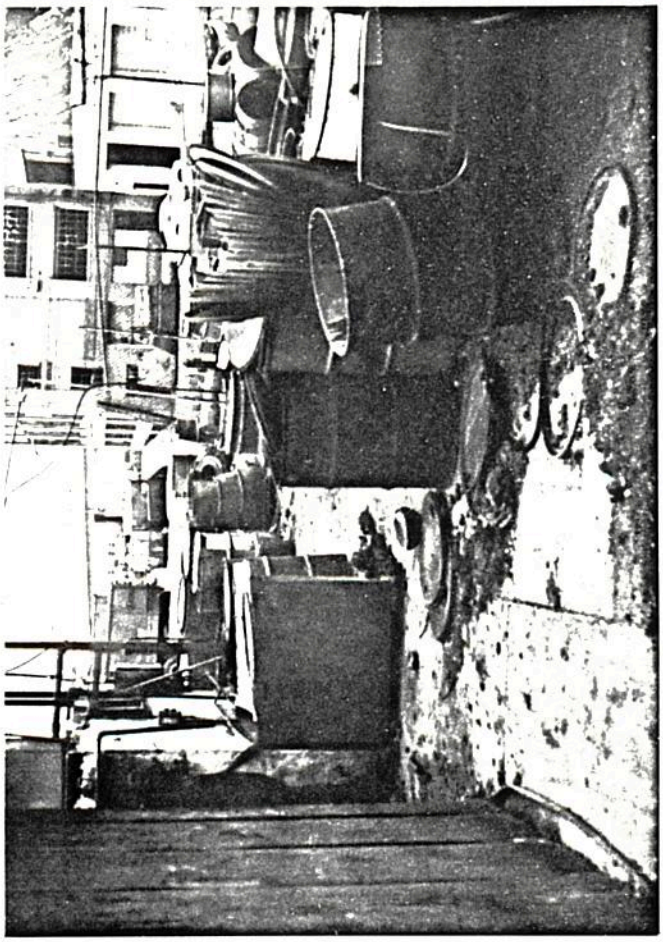

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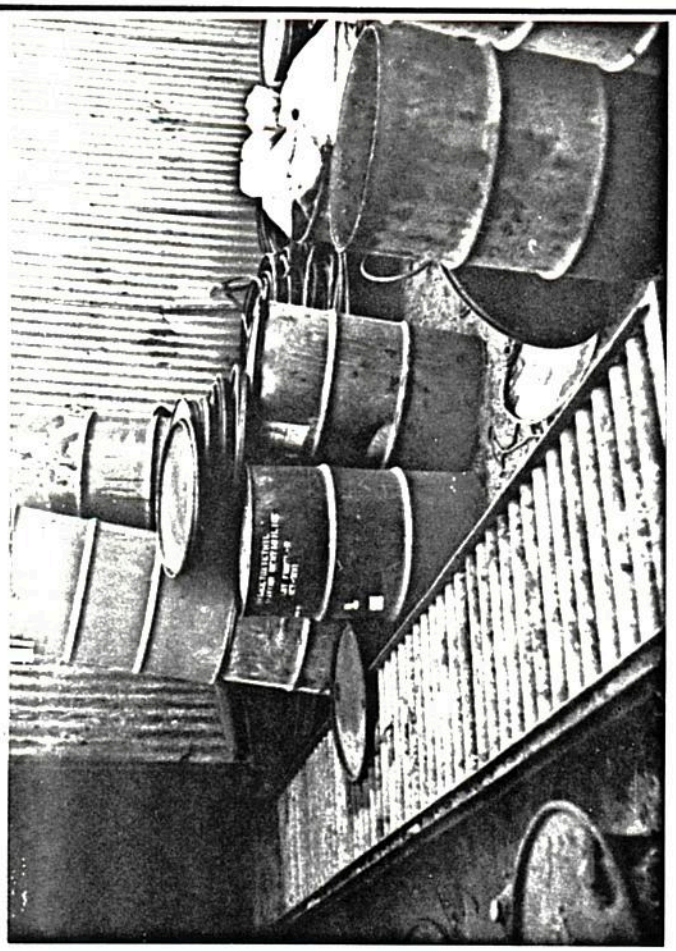
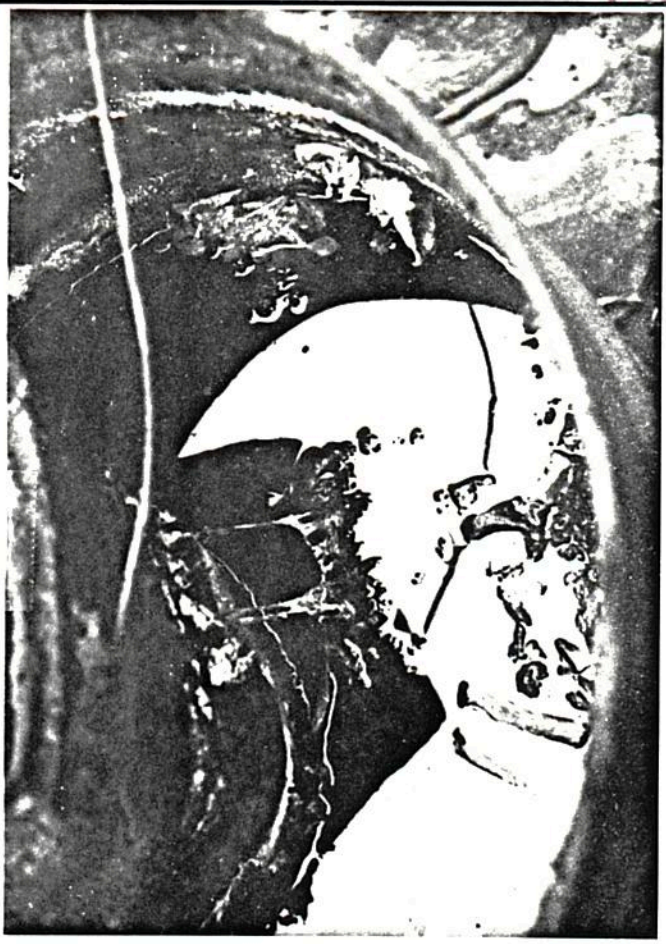
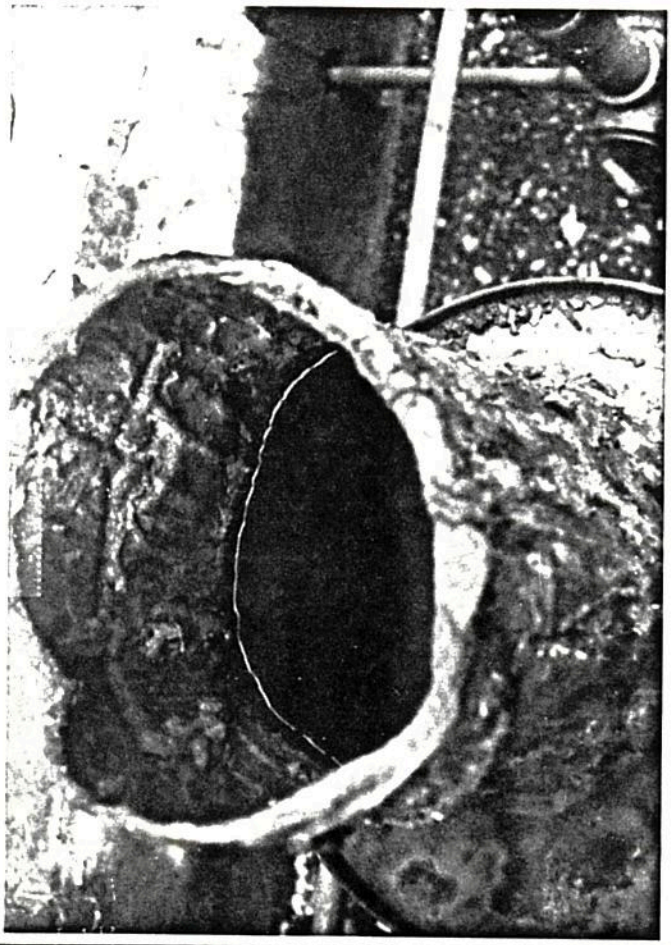
BUCKS STEEL DRUM
MD 51
12/07/81







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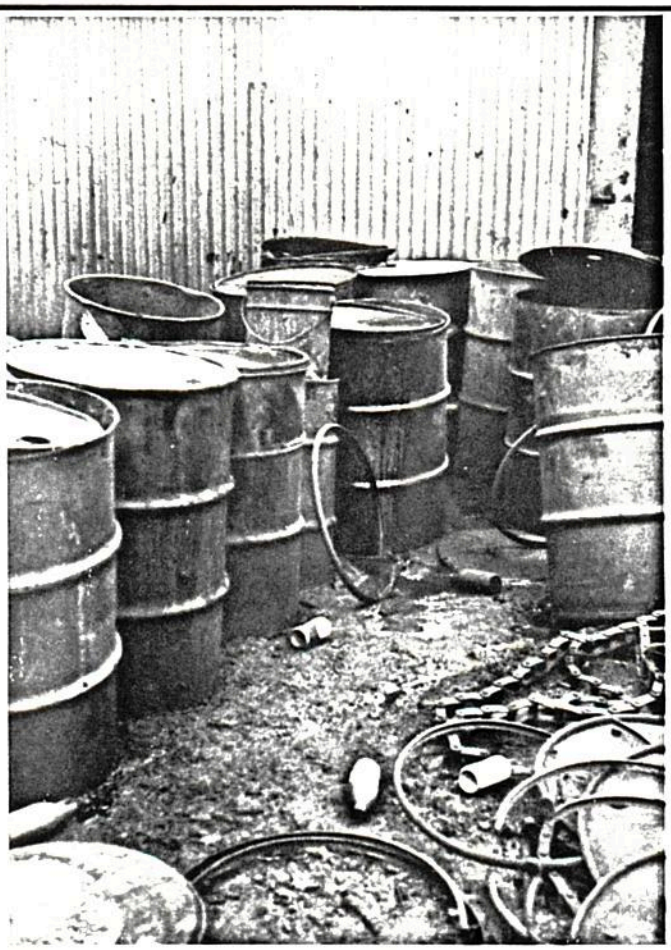
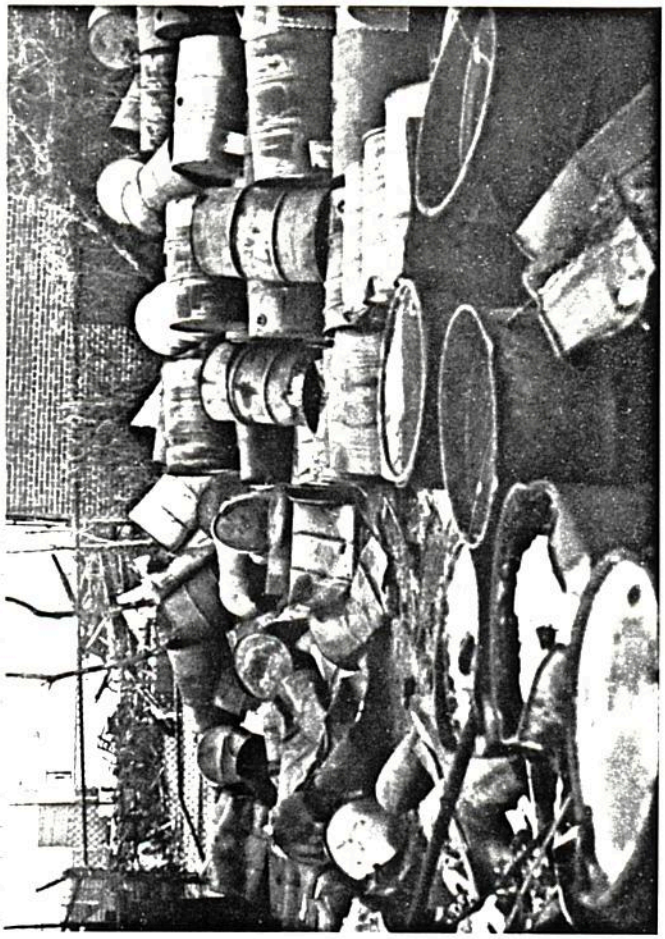
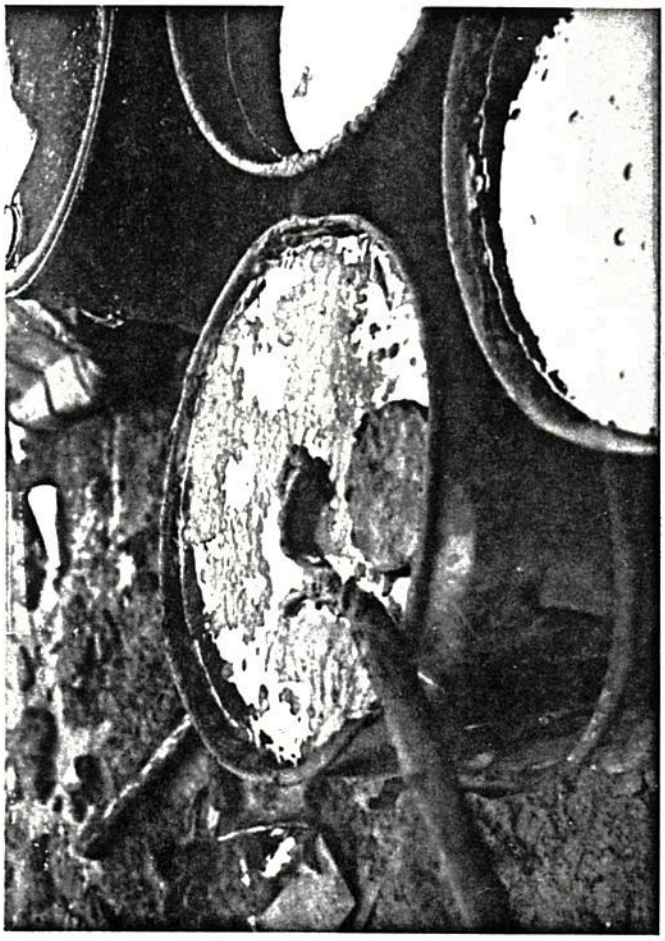
BUCKS STEEL DRUM
MD 51
12/07/81



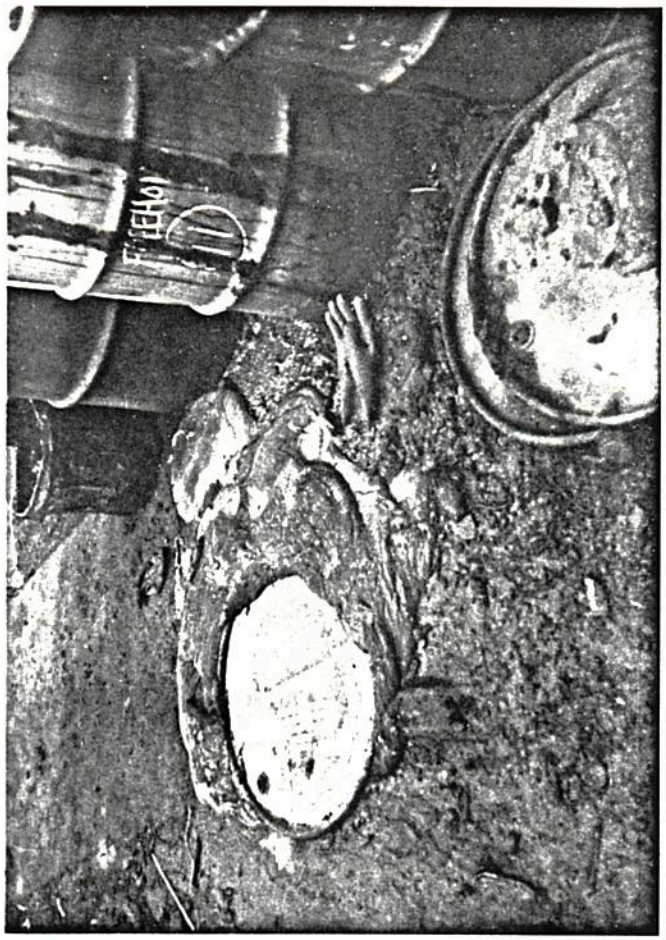




19	20
21	

BUCKS STEEL DRUM
MD 51
12/07/81

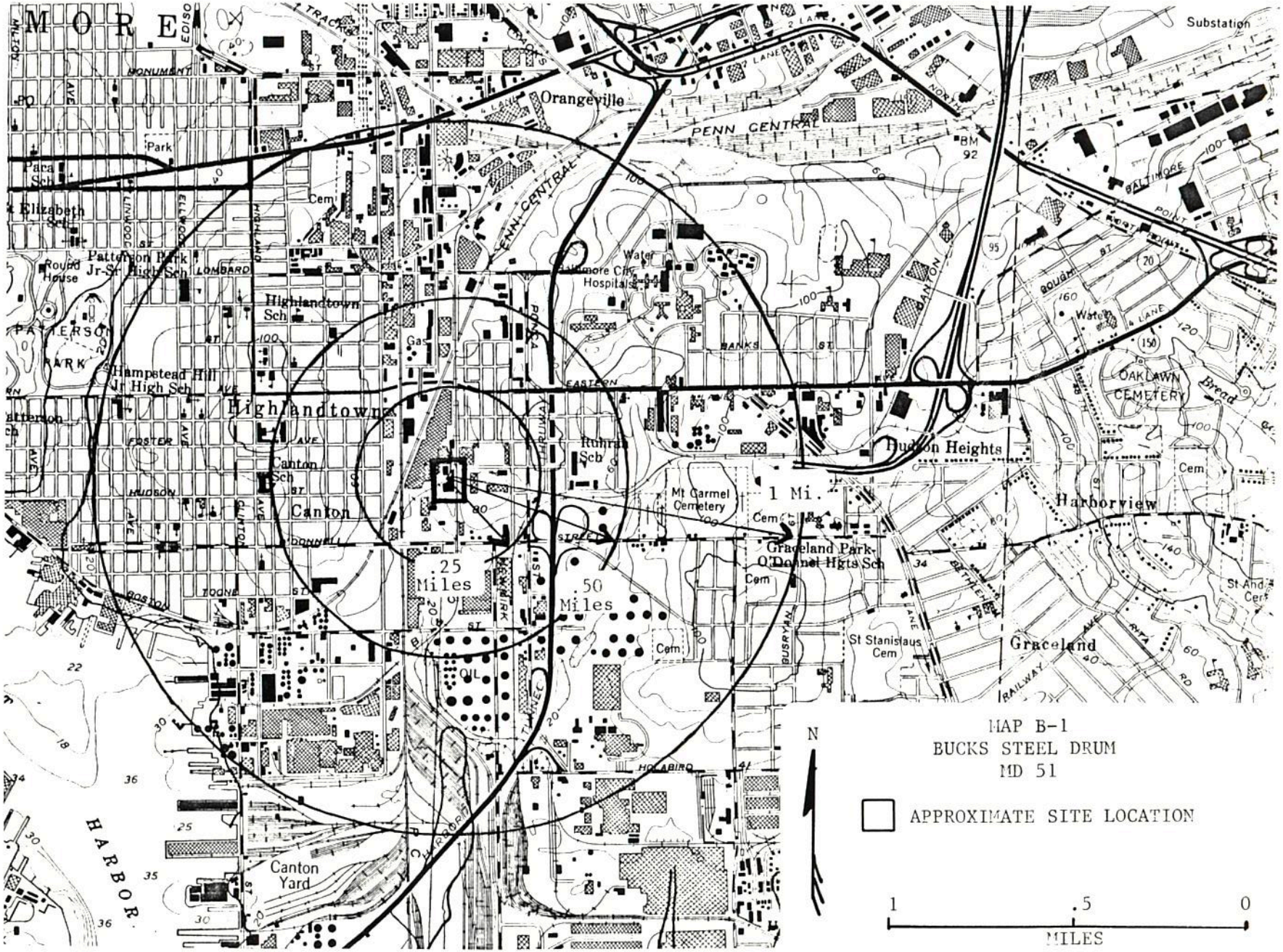
ORIGINAL
(Red)



23 | 24

BUCKS STEEL DRUM
MD 51
12/07/81

APPENDIX B: AREA AND SITE MAPS

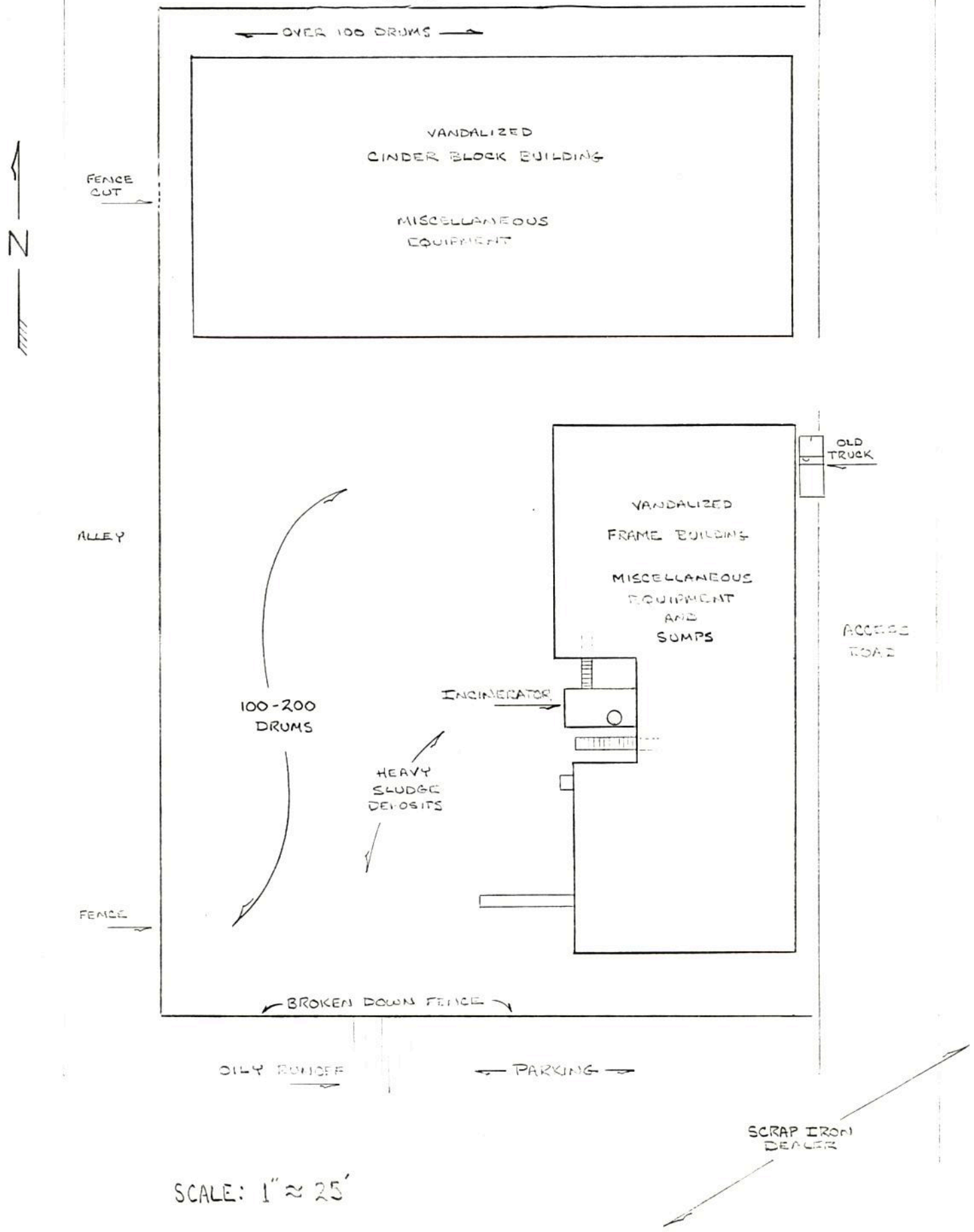


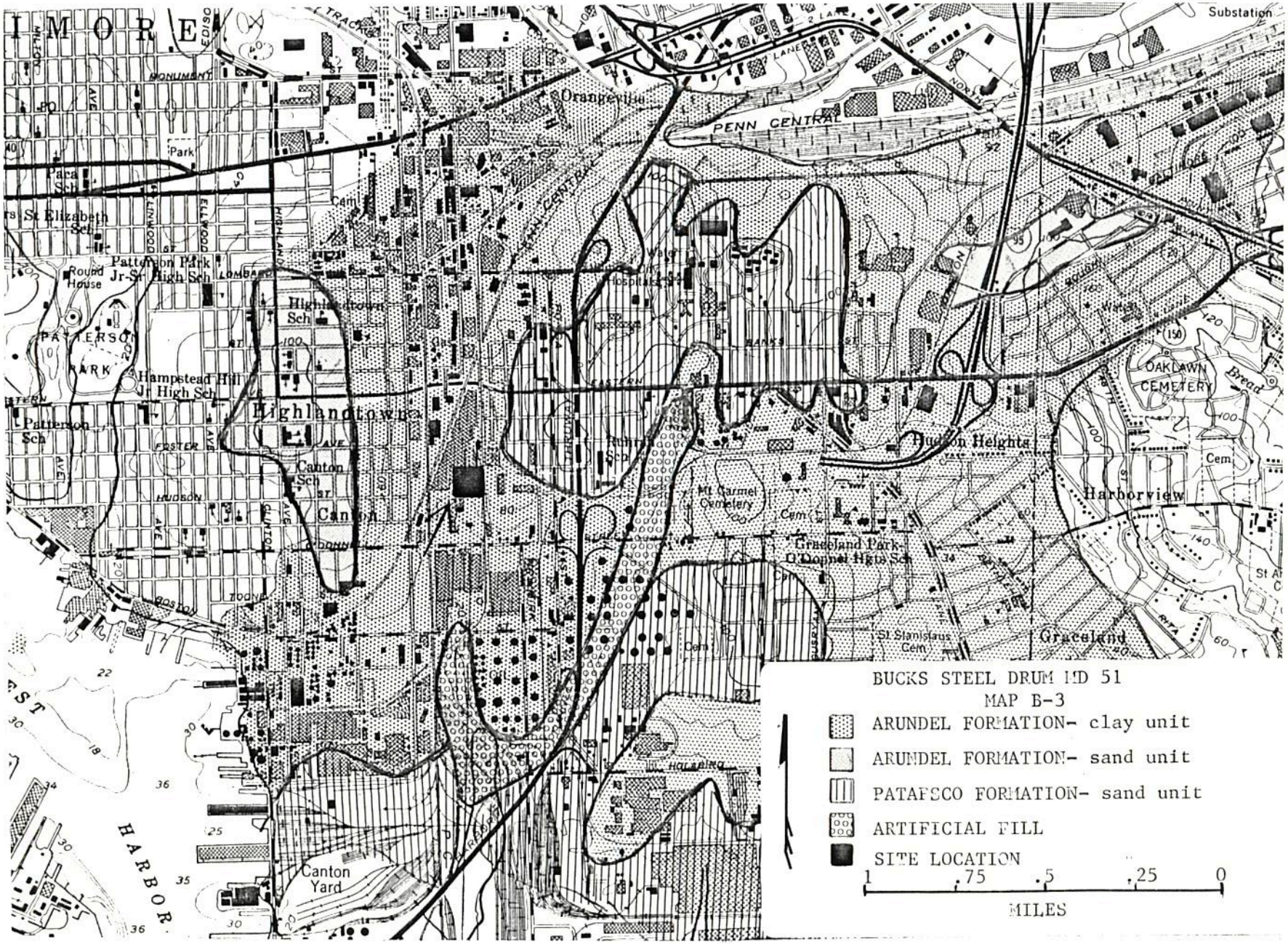
MAP B-1
BUCKS STEEL DRUM
MD 51

APPROXIMATE SITE LOCATION

ORIGINAL
(Red)

BUCKS STEEL DRUM
12/07/81
MD 51
SITE SKETCH
MAP B-2





APPENDIX C: U.S. EPA FORM T2070-2
POTENTIAL HAZARDOUS WASTE
IDENTIFICATION AND
PRELIMINARY ASSESSMENT

ORIGINAL

EPA

POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION	SITE NUMBER (to be assigned by Hq)
3	MD-51

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II *(Preliminary Assessment)*. File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force *(EN-335)*; 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME	B. STREET *(or other identifier)*		
Bucks Steel Drum	910 S. Kresson Street		
C. CITY	**D. STATE**	**E. ZIP CODE**	**F. COUNTY NAME**
Baltimore	MD		Baltimore

G. OWNER/OPERATOR *(if known)*

1. NAME	2. TELEPHONE NUMBER
Barton Kline, 701 E. Highland Street, Allentown, PA 18103	---

H. TYPE OF OWNERSHIP

☐ 1. FEDERAL ☐ 2. STATE ☐ 3. COUNTY ☐ 4. MUNICIPAL ☒ 5. PRIVATE ☐ 6. UNKNOWN

I. SITE DESCRIPTION

Site abandoned drum reclaimer. Two buildings on-site contain miscellaneous equipment. Sumps full of unidentified material. Approx. 250 drums on-site. Approx. 25% full of unidentified material.

J. HOW IDENTIFIED *(i.e., citizen's complaints, OSHA citations, etc.)*	K. DATE IDENTIFIED *(mo., day, & yr.)*
USEPA	1/23/80

L. PRINCIPAL STATE CONTACT

1. NAME	2. TELEPHONE NUMBER
Mr. Paul Thompson, MD Dept. of Health and Mental Hygiene	301-383-6650

II. PRELIMINARY ASSESSMENT *(complete this section last)*

A. APPARENT SERIOUSNESS OF PROBLEM

☐ 1. HIGH ☒ 2. MEDIUM ☐ 3. LOW ☐ 4. NONE ☒ 5. UNKNOWN

B. RECOMMENDATION

☐ 1. NO ACTION NEEDED *(no hazard)*

☐ 2. IMMEDIATE SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR: _____
b. WILL BE PERFORMED BY: _____

☒ 3. SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR: January, 1982
b. WILL BE PERFORMED BY: State of Maryland

☐ 4. SITE INSPECTION NEEDED *(low priority)*

C. PREPARER INFORMATION

1. NAME	2. TELEPHONE NUMBER	3. DATE *(mo., day, & yr.)*
Edward Tokarski, JRB Associates	703-821-4600	2/21/82

III. SITE INFORMATION

A. SITE STATUS

☐ 1. ACTIVE *(Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)*

☒ 2. INACTIVE *(Those sites which no longer receive wastes.)*

☐ 3. OTHER *(specify)*: _____ *(Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)*

B. IS GENERATOR ON SITE?

☒ 1. NO ☐ 2. YES *(specify generator's four-digit SIC Code)*: _____

C. AREA OF SITE *(in acres)*	D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES	
	1. LATITUDE *(deg.-min.-sec.)*	2. LONGITUDE *(deg.-min.-sec.)*
Less than 5 acres	39° 17' 01" N	76° 33' 35" W

E. ARE THERE BUILDINGS ON THE SITE?

☐ 1. NO ☒ 2. YES *(specify)*: Two abandoned buildings - have been vandalized

Continue On Reverse

ORIGINAL (Red)

Continued From Front

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

A. TRANSPORTER	B. STORER	C. TREATER	D. DISPOSER
1. RAIL	1. PILE	1. FILTRATION	1. LANDFILL
2. SHIP	2. SURFACE IMPOUNDMENT	X 2. INCINERATION	2. LANDFARM
3. BARGE	X 3. DRUMS	3. VOLUME REDUCTION	3. OPEN DUMP
4. TRUCK	4. TANK, ABOVE GROUND	4. RECYCLING/RECOVERY	4. SURFACE IMPOUNDMENT
5. PIPELINE	5. TANK, BELOW GROUND	5. CHEM./PHYS. TREATMENT	5. MIDNIGHT DUMPING
6. OTHER (specify):	6. OTHER (specify):	6. BIOLOGICAL TREATMENT	X 6. INCINERATION
		7. WASTE OIL REPROCESSING	7. UNDERGROUND INJECTION
		8. SOLVENT RECOVERY	8. OTHER (specify):
		X 9. OTHER (specify): Drum recycler	

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

Site took drums, drums sent through incinerator, drums then sold. Incinerator very crude - no heat or temperature control, no afterburner, no air pollution devices.

V. WASTE RELATED INFORMATION

A. WASTE TYPE

X 1. UNKNOWN X 2. LIQUID X 3. SOLID X 4. SLUDGE 5. GAS

B. WASTE CHARACTERISTICS

X 1. UNKNOWN 2. CORROSIVE 3. IGNITABLE 4. RADIOACTIVE 5. HIGHLY VOLATILE
6. TOXIC 7. REACTIVE 8. INERT 9. FLAMMABLE

10. OTHER (specify):

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

Approx. 250 drums on-site. Approx. 25% appear full.

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
X (1) PAINT, PIGMENTS	X (1) OILY WASTES	X (1) HALOGENATED SOLVENTS	X (1) ACIDS	X (1) FLYASH	X (1) LABORATORY PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER (specify):	(2) NON-HALOGNTD. SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER (specify):	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
(5) OTHER (specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER (specify):
			(6) CYANIDE	(6) OTHER (specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			(11) OTHER (specify)		

Continue On Page 3

Continued From Page 2

V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

Solvents N.O.S. - toluene
Chlorobenzene
Isocyanate
Oil and oil sludges
Paint sludges

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

State has sent notice of required clean-up to owner. Clean-up order includes at least drum re-packaging/removal, removal of 8" of dirt, removal of abandoned equipment, installation of security fence. Clean-up started February 1982.

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH				
3. NON-WORKER INJURY/EXPOSURE				
. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY	X			runoff enters storm sewers and into Patapsco River.
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER				
8. CONTAMINATION OF SURFACE WATER	X			runoff enters storm sewers and into Patapsco River.
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR	X			toluene, other solvents - volatile. incinerator not properly operated
. NOTICEABLE ODORS	X			reported by MD DHMH on 12/7/81
13. CONTAMINATION OF SOIL	X			observed by site team. Sample with 188 ppm toluene
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION	X			drums stored with volatile, flammable material
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS	X			noticed by site inspection team
17. SEWER, STORM DRAIN PROBLEMS				
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY	X			no gate, fence cut
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING				
22. OTHER (specify):				

Continued From Front

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

- [ ] 1. NPDES PERMIT
- [ ] 2. SPCC PLAN
- [ ] 3. STATE PERMIT *(specify)*: _____
- [ ] 4. AIR PERMITS
- [ ] 5. LOCAL PERMIT
- [X] 6. RCRA TRANSPORTER
- [X] 7. RCRA STORER
- [X] 8. RCRA TREATER
- [X] 9. RCRA DISPOSER
- [ ] 10. OTHER *(specify)*: _____

B. IN COMPLIANCE?

- [ ] 1. YES
- [X] 2. NO
- [ ] 3. UNKNOWN

4. WITH RESPECT TO *(list regulation name & number)*: _____

VIII. PAST REGULATORY ACTIONS

- [ ] A. NONE
- [X] B. YES *(summarize below)*

Clean-up required by state

IX. INSPECTION ACTIVITY *(past or on-going)*

- [ ] A. NONE
- [X] B. YES *(complete items 1,2,3, & 4 below)*

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION *(mo., day, & yr.)*	3. PERFORMED BY: *(EPA/State)*	4. DESCRIPTION
inspection	regular	state	performed prior to closure
sampling/investigation	1981	state	12 samples taken

X. REMEDIAL ACTIVITY *(past or on-going)*

- [X] A. NONE
- [ ] B. YES *(complete items 1, 2, 3, & 4 below)*

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION *(mo., day, & yr.)*	3. PERFORMED BY: *(EPA/State)*	4. DESCRIPTION

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment *(Section II)* information on the first page of this form.

MD-1640

EPA

POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION	SITE NUMBER (to be assigned by HQ)
3	MD-51

ORIGINAL (Red)

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II *(Preliminary Assessment)*. File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force *(EN-335)*; 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME: Bucks Steel Drum

B. STREET (or other identifier): 910 S. Kresson Street

C. CITY: Baltimore

D. STATE: MD

E. ZIP CODE: 21300

F. COUNTY NAME: Baltimore

G. OWNER/OPERATOR (If known)

1. NAME: Barton Kline, 701 E. Highland Street, Allentown, PA 18103

2. TELEPHONE NUMBER: ---

H. TYPE OF OWNERSHIP

☐ 1. FEDERAL ☐ 2. STATE ☐ 3. COUNTY ☐ 4. MUNICIPAL ☒ 5. PRIVATE ☐ 6. UNKNOWN

I. SITE DESCRIPTION

Site abandoned drum reclaimer. Two buildings on-site contain miscellaneous equipment. Sumps full of unidentified material. Approx. 250 drums on-site. Approx. 25% full of unidentified material.

J. IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.)

USEPA

K. DATE IDENTIFIED (mo., day, & yr.)

1/23/80

L. PRINCIPAL STATE CONTACT

1. NAME: Mr. Paul Thompson, MD Dept. of Health and Mental Hygiene

2. TELEPHONE NUMBER: 301-383-6650

II. PRELIMINARY ASSESSMENT (complete this section last)

A. APPARENT SERIOUSNESS OF PROBLEM

☐ 1. HIGH ☒ 2. MEDIUM ☐ 3. LOW ☐ 4. NONE ☐ 5. UNKNOWN

B. RECOMMENDATION

☐ 1. NO ACTION NEEDED *(no hazard)*

☐ 2. IMMEDIATE SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR: _____
b. WILL BE PERFORMED BY: _____

☒ 3. SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR: January 1982
b. WILL BE PERFORMED BY: State of Maryland

☐ 4. SITE INSPECTION NEEDED *(low priority)*

C. PREPARER INFORMATION

1. NAME: Edward Tokarski, JRB Associates

2. TELEPHONE NUMBER: 703-821-4600

3. DATE (mo., day, & yr.): 2/21/82

III. SITE INFORMATION

A. SITE STATUS

☐ 1. ACTIVE *(Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)*

☒ 2. INACTIVE *(Those sites which no longer receive wastes.)*

☐ 3. OTHER *(specify)*: _____ *(Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)*

B. IS GENERATOR ON SITE?

☒ 1. NO ☐ 2. YES *(specify generator's four-digit SIC Code)*: _____

C. AREA OF SITE (In acres)

Less than 5 acres

D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES

1. LATITUDE (deg.-min.-sec.): 39° 17' 01" N

2. LONGITUDE (deg.-min.-sec.): 76° 33' 35" W

E. ARE THERE BUILDINGS ON THE SITE?

☐ 1. NO ☒ 2. YES *(specify)*: Two abandoned buildings - have been vandalized

Continue On Reverse

Continued From: Front

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

A. TRANSPORTER	B. STORER	C. TREATER	D. DISPOSER
1. RAIL	1. PILE	1. FILTRATION	1. LANDFILL
2. SHIP	2. SURFACE IMPOUNDMENT	X 2. INCINERATION	2. LANDFARM
3. BARGE	X 3. DRUMS	3. VOLUME REDUCTION	3. OPEN DUMP
4. TRUCK	4. TANK, ABOVE GROUND	4. RECYCLING/RECOVERY	4. SURFACE IMPOUNDMENT
5. PIPELINE	5. TANK, BELOW GROUND	5. CHEM./PHYS. TREATMENT	5. MIDNIGHT DUMPING
6. OTHER (specify):	6. OTHER (specify):	6. BIOLOGICAL TREATMENT	X 6. INCINERATION
		7. WASTE OIL REPROCESSING	7. UNDERGROUND INJECTION
		8. SOLVENT RECOVERY	8. OTHER (specify):
		X 9. OTHER (specify): Drum recycler	

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

Site took drums, drums sent through incinerator, drums then sold. Incinerator very crude - no heat or temperature control, no afterburner, no air pollution devices.

V. WASTE RELATED INFORMATION

A. WASTE TYPE

X 1. UNKNOWN X 2. LIQUID X 3. SOLID X 4. SLUDGE 5. GAS

B. WASTE CHARACTERISTICS

X 1. UNKNOWN 2. CORROSIVE 3. IGNITABLE 4. RADIOACTIVE 5. HIGHLY VOLATILE
6. TOXIC 7 REACTIVE 8. INERT 9. FLAMMABLE

10. OTHER (specify): _____

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

Approx. 250 drums on-site. Approx. 25% appear full.

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
X (1) PAINT, PIGMENTS	X (1) OILY WASTES	X (1) HALOGENATED SOLVENTS	X (1) ACIDS	X (1) FLYASH	X (1) LABORATORY PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER (specify):	(2) NON-HALOGNTD. SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER (specify):	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
(5) OTHER (specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER (specify):
			(6) CYANIDE	(6) OTHER (specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			(11) OTHER (specify)		

ORIGINAL (Red)

V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

Solvents N.O.S. - toluene
Chlorobenzene
Isocyanate
Oil and oil sludges
Paint sludges

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

State has sent notice of required clean-up to owner. Clean-up order includes at least drum re-packaging/removal, removal of 8" of dirt, removal of abandoned equipment, installation of security fence. Clean-up started February 1982.

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH				
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY	X			runoff enters storm sewers and into Patapsco River.
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER				
8. CONTAMINATION OF SURFACE WATER	X			runoff enters storm sewers and into Patapsco River.
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR	X			toluene, other solvents - volatile. incinerator not properly operated
NOTICEABLE ODORS	X			reported by MD DHMH on 12/7/81
13. CONTAMINATION OF SOIL	X			observed by site team. Sample with 188 ppm toluene
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION	X			drums stored with volatile, flammable material
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS	X			noticed by site inspection team
17. SEWER, STORM DRAIN PROBLEMS				
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY	X			no gate, fence cut
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING				
22. OTHER (specify):				

Continued From Front

ORIGINAL (Red)

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

- [ ] 1. NPDES PERMIT
- [ ] 2. SPCC PLAN
- [ ] 3. STATE PERMIT *(specify)*: _____
- [ ] 4. AIR PERMITS
- [ ] 5. LOCAL PERMIT
- [X] 6. RCRA TRANSPORTER
- [X] 7. RCRA STORER
- [X] 8. RCRA TREATER
- [X] 9. RCRA DISPOSER
- [ ] 10. OTHER *(specify)*: _____

B. IN COMPLIANCE?

- [ ] 1. YES
- [X] 2. NO
- [ ] 3. UNKNOWN

4. WITH RESPECT TO *(list regulation name & number)*: _____

VIII. PAST REGULATORY ACTIONS

- [ ] A. NONE
- [X] B. YES *(summarize below)*

Clean-up required by state

IX. INSPECTION ACTIVITY *(past or on-going)*

- [ ] A. NONE
- [X] B. YES *(complete items 1,2,3, & 4 below)*

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION
inspection	regular	state	performed prior to closure
sampling/investigation	1981	state	12 samples taken

X. REMEDIAL ACTIVITY *(past or on-going)*

- [ ] A. NONE
- [ ] B. YES *(complete items 1, 2, 3, & 4 below)*

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment *(Section II)* information on the first page of this form.

DNR

ORIGINAL

EPA POTENTIAL HAZARDOUS WASTE SITE IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION	SITE NUMBER (to be assigned by Hq)
3	MD-51

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II *(Preliminary Assessment)*. File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force *(EN-335)*; 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME	B. STREET *(or other identifier)*	
BUCK's STEEL DRUM INC and RYAN's MOVING + HAULING CO.	910 S. KRESSON ST.	Site - 8234 ROSEBANK AVE.

C. CITY	D. STATE	E. ZIP CODE	F. COUNTY NAME
BALTIMORE	MD	21200	BALTIMORE

G. OWNER/OPERATOR *(if known)*

1. NAME: Harry and Herman Buck
2. TELEPHONE NUMBER:

H. TYPE OF OWNERSHIP

☐ 1. FEDERAL ☐ 2. STATE ☐ 3. COUNTY ☐ 4. MUNICIPAL ☒ 5. PRIVATE ☐ 6. UNKNOWN

I. SITE DESCRIPTION

J. HOW IDENTIFIED *(i.e., citizen's complaints, OSHA citations, etc.)*

K. DATE IDENTIFIED *(mo., day, & yr.)*

L. PRINCIPAL STATE CONTACT

1. NAME: John Lawther - MD.
2. TELEPHONE NUMBER:

II. PRELIMINARY ASSESSMENT *(complete this section last)*

A. APPARENT SERIOUSNESS OF PROBLEM

☐ 1. HIGH ☒ 2. MEDIUM ☐ 3. LOW ☐ 4. NONE ☐ 5. UNKNOWN

B. RECOMMENDATION

☐ 1. NO ACTION NEEDED *(no hazard)*

☐ 2. IMMEDIATE SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR:
b. WILL BE PERFORMED BY:

☐ 3. SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR:
b. WILL BE PERFORMED BY:

☐ 4. SITE INSPECTION NEEDED *(low priority)*

C. PREPARER INFORMATION

1. NAME	2. TELEPHONE NUMBER	3. DATE *(mo., day, & yr.)*
MARC C. LEONETTI	215-597-7237	2/14/80

III. SITE INFORMATION

A. SITE STATUS

☒ 1. ACTIVE *(Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)*

☐ 2. INACTIVE *(Those sites which no longer receive wastes.)*

☐ 3. OTHER *(specify)*: *(Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)*

B. IS GENERATOR ON SITE?

☒ 1. NO ☐ 2. YES *(specify generator's four-digit SIC Code)*:

C. AREA OF SITE *(in acres)*

D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES

1. LATITUDE *(deg.-min.-sec.)*
2. LONGITUDE *(deg.-min.-sec.)*

E. ARE THERE BUILDINGS ON THE SITE?

☐ 1. NO ☐ 2. YES *(specify)*:

Continue On Reverse

Continued From Front

ORIGINAL (Red)

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

'X'	A. TRANSPORTER
	1. RAIL
	2. SHIP
	3. BARGE
X	4. TRUCK
	5. PIPELINE
	6. OTHER (specify):

'X'	B. STORER
	1. PILE
	2. SURFACE IMPOUNDMENT
X	3. DRUMS
	4. TANK, ABOVE GROUND
	5. TANK, BELOW GROUND
	6. OTHER (specify):

'X'	C. TREATER
	1. FILTRATION
	2. INCINERATION
	3. VOLUME REDUCTION
	4. RECYCLING/RECOVERY
	5. CHEM./PHYS. TREATMENT
	6. BIOLOGICAL TREATMENT
	7. WASTE OIL REPROCESSING
	8. SOLVENT RECOVERY
	9. OTHER (specify):

'X'	D. DISPOSER
	1. LANDFILL
	2. LANDFARM
	3. OPEN DUMP
	4. SURFACE IMPOUNDMENT
	5. MIDNIGHT DUMPING
	6. INCINERATION
	7. UNDERGROUND INJECTION
	8. OTHER (specify):

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

V. WASTE RELATED INFORMATION

A. WASTE TYPE

☐ 1 UNKNOWN ☒ 2. LIQUID ☒ 3. SOLID ☐ 4. SLUDGE ☐ 5. GAS

B. WASTE CHARACTERISTICS

☐ 1. UNKNOWN ☐ 2. CORROSIVE ☐ 3. IGNITABLE ☐ 4. RADIOACTIVE ☒ 5 HIGHLY VOLATILE
☐ 6. TOXIC ☐ 7. REACTIVE ☐ 8. INERT ☒ 9 FLAMMABLE

☐ 10. OTHER (specify): _____

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
'X' (1) PAINT, PIGMENTS	'X' (1) OILY WASTES	'X' (1) HALOGENATED SOLVENTS	'X' (1) ACIDS	'X' (1) FLYASH	'X' (1) LABORATORY PHARMACEUT.
(2) METALS SLUDGES	X (2) OTHER (specify): 55 gallon drums containing petroleum products.	(2) NON-HALOGNTD SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER (specify):	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
(5) OTHER (specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER (specify):
			(6) CYANIDE	(6) OTHER (specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			(11) OTHER (specify)		

Continue On Page 3

Continued From Page 2

ORIGINAL (Red)

V. WASTE RELATED INFORMATION *(continued)*

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE *(place in descending order of hazard)*.

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD *(mark 'X')*	C. ALLEGED INCIDENT *(mark 'X')*	D. DATE OF INCIDENT *(mo., day, yr.)*	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH				
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER	X			
8. CONTAMINATION OF SURFACE WATER	X			
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR				
12. NOTICEABLE ODORS				
13. CONTAMINATION OF SOIL				
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION				
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS				
17. SEWER, STORM DRAIN PROBLEMS				
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY				
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING				
22. OTHER *(specify)*:				

Continue On Reverse

ORIGINAL (Red)

Continued From Front

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

☐ 1. NPDES PERMIT ☐ 2. SPCC PLAN ☐ 3. STATE PERMIT *(specify)*: _____

☐ 4. AIR PERMITS ☐ 5. LOCAL PERMIT ☐ 6. RCRA TRANSPORTER

☐ 7. RCRA STORER ☐ 8. RCRA TREATER ☐ 9. RCRA DISPOSER

☒ 10. OTHER *(specify)*: None

B. IN COMPLIANCE?

☐ 1. YES ☐ 2. NO ☒ 3. UNKNOWN

4. WITH RESPECT TO *(list regulation name & number)*: _____

VIII. PAST REGULATORY ACTIONS

☐ A. NONE ☒ B. YES *(summarize below)*

Consent order Nov. 20, 1979 to cease dumping and to remove all the drums and spilled petroleum products referenced by complaint # C-80-252

IX. INSPECTION ACTIVITY *(past or on-going)*

☐ A. NONE ☐ B. YES *(complete items 1,2,3, & 4 below)*

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION *(mo., day, & yr.)*	3. PERFORMED BY: *(EPA/State)*	4. DESCRIPTION

X. REMEDIAL ACTIVITY *(past or on-going)*

☐ A. NONE ☐ B. YES *(complete items 1, 2, 3, & 4 below)*

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION *(mo., day, & yr.)*	3. PERFORMED BY: *(EPA/State)*	4. DESCRIPTION

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment *(Section II)* information on the first page of this form.